IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
GREENBELT DIVISION

PATRICIA FLETCHER, *et al.*,	*	
Plaintiffs,	*	
v.	*	Civil Action No: 8:11-cv-03220-RWT
LINDA H. LAMONE, *et al.*,	*	
Defendants.	*	

* * * * * * * * * * * * * * * *

AFFIDAVIT OF KEVIN COMBS

1. I, Kevin Combs, am over eighteen years of age and am competent to testify.

2. I am the Deputy Chief Information Officer, Information Technology and Communications Division, Maryland Department of Public Safety and Correctional Services. The Information Technology and Communications Division ("ITCD") maintains the data systems, including systems containing demographic information about inmates housed in the Maryland Division of Correction, for the Maryland Department of Public Safety and Correctional Services.

3. One of the systems maintained by ITCD is the Offender Based State Corrections Information System ("OBSCIS") which maintains demographic and other information concerning inmates housed in the Maryland Division of Correction ("DOC").

4. The OBSCIS system was used to determine what inmates were housed in the DOC on April 1, 2010. The list of inmates was then separated into two extracts based

on inmate address code: one for those listed as Maryland residents and one for those listed as non-Maryland residents. The two extracts were then forwarded to the correctional facilities where the inmates were housed so that the lists could be reviewed for accuracy and for the completion of any missing address fields or correction of any inaccurate address fields.

5. In addition, each DOC correctional facility received separate spreadsheets identifying each inmate and inmate address and the missing or inaccurate address fields.

6. Each DOC correctional facility then used three sources to get missing addresses or to correct inaccurate addresses:

a. Spoke to the inmate when possible;

b. Obtained the address from the pre-sentence investigation document; or

c. Obtained the address from the DOC intake form.

7. Based on the updated and corrected spreadsheets received from each DOC correctional facility, the updated address information was incorporated into one database that was sent to the Maryland Department of Planning on February 4, 2011.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the foregoing affidavit are true.

12/1/11
DATE

KEVIN COMBS